

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

National Association of Diversity Officers in
Higher Education, et. al.,

Plaintiffs,

v.

Donald J. Trump, in his official capacity as
President of the United States,

Defendant.

Civil Action No. 1:25-cv-333-ABA

**SUPPLEMENTAL DECLARATION OF PRESIDENT AND CHIEF EXECUTIVE
OFFICER OF THE NATIONAL ASSOCIATION OF DIVERSITY OFFICERS IN
HIGHER EDUCATION**

I, Paulette Granberry Russell, hereby attest:

1. I am over eighteen years old, of sound mind, and fully competent to make this declaration. I also have personal knowledge of the factual statements contained herein.
2. As I explained in my February 12, 2025, declaration (Doc. 27-23), I am the current President and Chief Executive Officer of the National Association of Diversity Officers in Higher Education ("NADOHE"), the nation's leading association for chief diversity officers and professionals in postsecondary education.
3. As I previously discussed in my February 12 declaration, NADOHE, its institutional members, and its individual members have already suffered significant harms from the J20 and J21 Orders.
4. For instance, Institutional Member A, described in ¶ 22 of my February 12 declaration, cancelled its conference after learning that the Department of Labor had issued a

“stop work” instruction for the grant that would pay for the conference based on the Orders.

Institutional Member A, which received a sub-award under a larger grant, was told by the primary grantee that DOL had provided that instruction and directed to stop all work under the award and cancel the conference.

5. In the week since my declaration, additional harms have come to light.

6. For example, Individual Member A, described in ¶ 33 of my February 12 declaration, lost her salary and any discretionary funds when all of her contracts “c[a]me to an abrupt halt and contracting for future work . . . evaporated.” Those contracts were primarily funded directly or indirectly by the National Science Foundation. As a result, Individual Member A lost her ability to participate in professional conferences and was unable to cover the cost of her participation in NADOHE’s annual conference. NADOHE covered Individual Member A’s registration for our annual conference.

7. In addition, a number of registered participants have had to cancel their attendance at our annual conference as a result of the Executive Orders. Consistent with our policy, NADOHE has refunded nearly \$7,500 in registration fees that those participants had already paid.

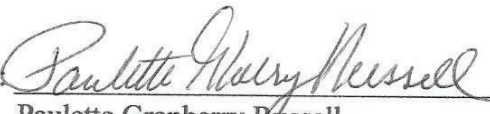
8. NADOHE relies on revenue from our annual conference, membership dues, professional development, and our peer reviewed journal to maintain the organization. If Individual Member A and others like her are unable to attend or pay the annual conference fees, NADOHE will not be able to survive. Similarly, these registration refunds, combined with the increasing difficulty of holding the annual conference that focuses on diversity, equity, and inclusion in higher education, and retaining our membership, decrease our revenue.

Cumulatively, these direct impacts of the Executive Orders harm NADOHE’s ability to sustain

itself.

Under 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed: February 18, 2025

By: 
Paulette Granberry Russell
President and Chief Executive Officer
NADOHE